Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Petition of Aviation Spectrum Resources, Inc.	)	RM No. 11818
for Amendment of Sections 87.173(b) and	)	
87.263(a) of the FCC's Rules to Allow Use of	)	
the Lower 136 MHz Band by Aeronautical	)	
Enroute Stations	)	

REPLY COMMENTS OF SITAONAIR

SITAONAIR hereby submits these reply comments on the petition for rulemaking submitted by Aviation Spectrum Resources, Inc. ("ASRI") on allowing the lower 136 MHz frequency spectrum to be used by Aeronautical Enroute Stations.

I. INTRODUCTION

SITAONAIR is a subcontractor to the Harris Corporation and a division of Societé Internationale de Telecommunications Aeronautiques / World Airlines Telecommunications Services Company (SITA) which has been providing telecommunications services to the airline community since 1949. Starting in 1985 the range of these services was expanded to include air-ground datalink communications, initially for Airlines Operational Control (AOC) communications but since 1991 also for Air Traffic Control (ATC) communications through the system calls FANS (Future Air Navigation Services), initially mainly in oceanic and remote airspace.

The VHF spectrum that the ASRI petition concerns is required to provide the necessary capacity for the timely, efficient and error-free delivery of digital FANS ATC messages that pilots and air

traffic controllers use to coordinate their actions instead of the traditional voice radio communications.

II. SUPPORTING INFORMATION

In 2010, in preparation for the planned introduction of the Datacomm program by the FAA, the members of ASRI developed a frequency plan for the upper VDL band (136.500 – 136.975 MHz). While that initial plan was adequate to satisfy the initial capacity needs for the Datacomm program as well as the airlines AOC traffic, it required careful coordination and planning between different datalink service providers to prevent interference to take full advantage of the available capacity. The addition of the VHF channels that are available in the lower 136 MHz band not only adds additional capacity but, more importantly, greatly simplifies the process of deploying and installing ground stations as well as reducing the possibility of interference. This, in turn, permits the datalink service providers to respond much more rapidly to the changing and increasing AOC and ATC datalink traffic requirements.

III. CONCLUSION

SITA, in line with all other companies that in one way or another are impacted by aviation datalink services, fully supports the ASRI petition and requests that the Commission accepts the proposed changes.

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Respectfully Submitted,

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